

1 Ryan Lee (SBN: 235879)
2 Krohn & Moss, Ltd.
3 10474 Santa Monica Blvd., Suite 401
Los Angeles, CA 90025
T: (323) 988-2400 x 241
F: (866) 799-3206
rlee@consumerlawcenter.com
Attorney for Plaintiff,
5 DANA PASQUALE

6 **UNITED STATES DISTRICT COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA**
SAN JOSE DIVISION

8 DANA PASQUALE,) **Case No.: 4:11-cv-05265-YGR**
9 Plaintiff,)
10 v.) **Plaintiff's Request for Telephonic**
LAW OFFICES OF NELSON &) **Appearance at Case Management**
11 KENNARD,) **Conference on May 14, 2012**
12 Defendant.)
13

14
15 **PLAINTIFF'S REQUEST FOR TELEPHONIC APPEARANCE AT CASE**
16 **MANAGEMENT CONFERENCE ON MAY 14, 2012**

17 NOW COMES the undersigned counsel of record for Plaintiffs, DANA PASQUALE,
18 and respectfully requests the Court allow his telephonic appearance at the case management
19 conference scheduled for May 14, 2012 at 2:00 P.M PDT. Counsel's office is located in Los
20 Angeles, California and personal attendance would impose extraordinary hardship. The expense
21 of traveling from Los Angeles, California to San Francisco, California could exceed the
22 maximum statutory relief of \$1,000.00 under the Fair Debt Collection Practices Act, 15 U.S.C.
23 1692 *et seq.* ("FDCPA"). Appearing by telephone will avoid the significant time and resources
24 needed to secure travel and appearance for the conference. If counsel's motion is granted,
25

1 counsel agrees to telephonically appear for the entire duration and to fully participate in the
2 conference so that his appearance by telephone will not affect the conference in any way.

3 THEREFORE, Plaintiff's counsel respectfully requests this Honorable Court to allow
4 him to appear telephonically at the case management conference.
5
6

7 RESPECTFULLY SUBMITTED,

8 DATED: April 19, 2012

KROHN & MOSS, LTD.

9 By: /s/ Ryan Lee

10 Ryan Lee, Esq.
11 Attorney for Plaintiff
12
13
14
15
16
17
18
19
20
21
22
23
24
25